

EXHIBIT 7

From: David Wolkinson <dwolkinson@gmail.com>
Sent: Monday, December 30, 2024 8:37 PM
To: Knoblett, John Tyler
Cc: Governski, Meryl Conant; Nathan, Aaron E.; Houghton-Larsen, M Annie
Subject: Re: Freeman v. Giuliani - Goodman Deposition Tomorrow

*** EXTERNAL EMAIL ***

Thank you very much for your thoughtfulness and consideration of my calendar. Looking forward to meeting you over zoom tomorrow. As for the issue with the request for documents I'll be speaking to my client later this evening and if there is anything we can procure before tomorrow I'll be sure to send it along!

Sent from my iPhone

On Dec 30, 2024, at 8:19 PM, Knoblett, John Tyler <JKnoblett@willkie.com> wrote:

David,

Thank you for your email. We appreciate you have a prior engagement tomorrow morning that cannot be moved. Given that, we are amenable to a start time of 1:00 PM ET tomorrow for the deposition. Please note, however, that we are entitled to a full 7 hours of deposition time and so we cannot guarantee that the deposition will conclude by normal close of business hours.

Please confirm within the next hour whether we should proceed at 9:00 AM ET or 1:00 PM ET.

Relatedly, I wanted to raise that Mr. Goodman has failed to produce a single document responsive to the document subpoena we personally served on him several weeks ago. Mr. Goodman is also in violation of the Court's order granting our motion to compel his production of documents. As such, we reserve all rights and waive none. Of course, we would welcome any document production from your client in advance of his deposition while reserving all rights.

Thank you,

Tyler

John Tyler Knoblett
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From: David Wolkinson <dwolkinson@gmail.com>
Sent: Monday, December 30, 2024 7:53 PM

To: Knoblett, John Tyler <JKnoblett@willkie.com>

Subject: Re: Freeman v. Giuliani - Goodman Deposition Tomorrow

*** EXTERNAL EMAIL ***

Dear Mr. Knoblett,

Thank you for your message. I appreciate your frustration at how this process has played out. My client wants to be deposed tomorrow (in compliance with the court orders). Unfortunately, I have a prior engagement in the morning that I can not move. I can definitely be available at 1 pm tomorrow to represent my client at the deposition. Would you be willing to accommodate my schedule so that we can get this deposition wrapped up as per the court order? Alternatively, I spoke with your opposing counsel and they expressed a willingness to stipulate to a deposition after the 31st (if that is your preference). Please let me know your thoughts on either of these options. I communicated to your colleague that I was unavailable to speak but I left the event I was attending to address this issue, so if there is a reason to talk don't hesitate to contact me (anytime!) 248 804 1961. Thank you very much for your consideration of this matter and I hope that we can amiably resolve this issue.

Sincerely,

David

On Mon, Dec 30, 2024 at 7:21 PM Knoblett, John Tyler <JKnoblett@willkie.com> wrote:

Mr. Wolkinson,

Thank you for speaking briefly to my colleague Annie Houghton-Larsen, as she mentioned, I will be the questioning attorney tomorrow. Per your conversation with Annie, we understand that Mr. Goodman only reached out to you this evening at 4:58 p.m. and therefore you are not up to speed on the events to date. To that end, I provide the below summary of events and the attached correspondences.

On December 10, 2024, the Court granted Plaintiffs' motion to compel Mr. Goodman to produce all documents responsive to Plaintiffs' document subpoena (attached), which was personally served on Mr. Goodman in Palm Beach Florida while he was with Mr. Giuliani. That order (attached), also permitted Plaintiffs to serve Mr. Goodman by alternative means—specifically, by emailing him at the tedgoodman81@gmail.com email address and by certified mail to his address in Arlington Virginia and in Palm Beach Florida, where we previously personally served the document request subpoena. On December 11, we served that order and a deposition subpoena requiring Mr. Goodman's testimony in New York on December 30, 2024 at 1:00 PM (email and affidavit of service attached).

We subsequently corresponded with Mr. Goodman at the tedgoodman81@gmail.com email address for multiple weeks regarding his failure to produce documents and the upcoming deposition. I am attaching an email chain that includes this correspondence up until late today.

I also have attached the Court's order dated December 20 providing that "No witness will be permitted to testify unless that witness has made full compliance with any interrogatories or document requests and shall have submitted himself or herself to a noticed deposition by December 31, 2024, absent a showing of good cause." I am also attaching Mr. Giuliani's witness list submitted to the Court on December 23, which states that he intends to call Mr. Goodman as a witness at the January 16 trial.

As you can see, we properly served Mr. Goodman with a deposition subpoena for December 30, 2024 multiple weeks ago and even provided reminders to Mr. Goodman on December 19th, December 23rd, and December 24th.

Today at 6:23 AM, Mr. Goodman emailed us asking to postpone his deposition (which was scheduled in-person in New York for 1:00 PM today) for "24 hours." One of our attorneys who was planning to take Mr. Goodman's deposition today was about to leave for the train station to New York for his train when we received this email. Despite this last minute cancellation, we offered to conduct Mr. Goodman's deposition remotely tomorrow (New Year's Eve) and agreed to his preferred time of 9:00 AM on Zoom. As seen in the attached emails, at 1:07 PM today Mr. Goodman then retracted his offer of a remote deposition for 9:00 AM on New Year's Eve citing various excuses, and suggesting "let's do 11 am or later if possible" only to follow-up at 1:30 PM to ask for the depo to begin at "1 PM ET tomorrow."

Of course, the time to move to quash has passed, and thus Mr. Goodman's objection to the place and time of the deposition is waived, even if such objections were proper. Moreover, given the long history set forth above and the Court's order that all productions and depositions must be completed by December 31, 2024, I am sure you can understand that we are unable to grant Mr. Goodman's request that the deposition take place tomorrow afternoon or at any date in the New Year. We have sent Mr. Goodman a Zoom link for his remote deposition for 9:00 AM tomorrow (12/31). Now that we know Mr. Goodman is represented, we will send this zoom link information to you as well.

Thank you,

Tyler

John Tyler Knoblett

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